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October 10, 2007

Honorable Harold Baer United States District Judge United States Courthouse 500 Pearl Street New York, NY 10007

Re:

United States v. Lorenzo Rodriguez et al. 07 CR 699 (HB)

Dear Judge Baer:

I write as CJA appointed counsel for Lorenzo Rodriguez, the lead defendant in the above captioned case. I am writing to request your authorization for payment for trial hours, in the event we go to trial, of my associate, Avrom Robin, so that he may assist me ("second seat") at trial.

18 USC § 3006A, which provides for adequate representation of defendants, authorizes expenses necessary for adequate representation of financially eligible persons.

Mr. Robin has worked closely with me on this case, pre-trial. Mr. Robin's full time a needed in the courtroom to aid me in trial matters, especially because I have other So trials starting immediately before and after this one, as I explained to you today

The government will have two attorneys present as a matter of cours

If I were retained privately in a similar case, I would insist that m **i**ney in order to assist me at trial.

Last year, and the year before, two of your co from me for a trial, also in the Southern District.

Enclosed are two copies of a proposi est. Please mail one copy to my office, so that I may subm

Enclosure

Endorsement:

I have 3 thoughts:

- 1. Obviously only one attorney's time is billable.
- 2. CJA adm. tells me this is allowed only for complicated cases and the AUSA says this is not complicated.
- 3. Let's wait and see if there is a trial for your client for now what you have billed will be OK.